

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
)

Amendment of Part 97 of the Commission's )  
Amateur Radio Service Rules to Eliminate ) RM - 10786  
Morse Code Proficiency Testing Requirements )  
For All Classes of Amateur Licenses )

To: The Commission )

Comments Of: Corey Brookfield  
KG6CSF

Gentlemen,

I would like to add my views to the growing list of Amateur Radio operators who feel that the requirement to pass a Morse Proficiency Exam, as a requirement for the use of the Amateur bands below 50mhz, has hindered the advancement of Ham Radio as a hobby, as well as an important tool for public safety in these new and troubled times we find our selves in since 9/11. I have been a licensed Tech operator since 8-4-2000. I have studied and passed the written General License exam on 4-19-2003. I have spent endless hours trying to master Morse Code over the years and have meet with little success. I feel that I, like many others, are well qualified to operate, using all modes and available bands, regardless of the inability to pass the Morse Code requirements. I feel the skills of a large number of currently licensed and future amateurs are going to waste because we are hanging on to specific mode requirement, only because of tradition at this point. I am not against the use of Morse Code in any way, or any other modes of operation for that matter, I just do not understand why it is the only "Mode" that is a test requirement for earning an advanced license class. Other modes of operation that are currently allowed "No Code Techs" are much more complex, yet there is no separate testing requirement. I feel that if we are going to keep and grow our pool of trained radio operators, we must drop the Morse requirement as soon as possible. I would like to see the the Morse requirement removed for the good of Amateur Radio, and to bring the USA to an equal footing with the bulk of the worlds countries. Let's not get left behind and leave Amateur Radio to wither and die because we are unwilling to challenge tradition. We no longer use horses as our major mode of transportation, so we no longer have rules on our drivers license tests which pertain to wagons and harnesses. Let's not fall behind with the very important service Radio Operators provide during power outages, fires, rescues, storms and countless other times of need, because otherwise talented folks were discouraged from moving up in license class. I know at least 5 or 6 persons, including myself who would be volunteering there time for public service, beyond the "above 50 mhz" bands, as soon as the Morse requirement was dropped. I request the immediate removal of the Morse Code Testing requirement, for the good of Amateur Radio and the advance of radio science in general. We can not attract new operators in 2003 and beyond if we do not abandon the requirement to send and receive in a Mode hanging on from the 1930's. Please consider my request.

Times and technology have changed dramatically over the years, and all of the previously claimed reasons for requiring Morse proficiency of all amateur radio operators have disappeared.

- o Virtually no government or commercial radio service uses Morse telegraphy in today's world.
- o Thus, the historical need of the government, commercial, and maritime services for a "pool of (Morse) trained operators" has ceased to exist.
- o Morse Skill is no longer required for effective emergency communications by amateur operators

The maintenance of Morse proficiency tests as a requirement for any amateur radio license is no longer in accord with the purpose of the amateur radio Service and serves no legitimate regulatory purpose.

The maintenance of the Morse requirement appears to be contrary to one of the commission's statutory mandates. Even the IARU recognizes that continuing Morse proficiency requirements is not in the best interest of the future of the amateur radio service.

The ONLY reason that the Commission cited in its most recent comprehensive review of its Part 97 amateur rules (WT Docket No. 98-143) for keeping any Morse testing at the its decision in that Proceeding no longer exists.

- o The Commission concluded in WT Docket No. 98-143 that the public interest will best be served by reducing the (Morse) telegraphy examination requirement to the minimum requirement that that meets the [ITU] Radio Regulations.

- o The "minimum requirement that meets the ITU Radio Regulations" for any class of amateur license is now no Morse test at all.

Since the Commission is no longer bound by an unwaiveable requirement in the ITU Radio Regulations it can, and should, act promptly to remove an unnecessary, restrictive requirement.

Other administrations (Switzerland, the United Kingdom, Belgium, Germany, The Netherlands, and Norway) have already eliminated Morse test requirements and many more are expected to follow suit rapidly.

It is not in the public interest for the Commission to impose more onerous and unnecessary burdens on those seeking a Commission-issued amateur radio license than would be faced by equally qualified individuals in other countries, as this will unnecessarily limit the pool of operators available for emergency communications.

The Commission's own determinations, as well as a significant body of public comment, from the Proceedings in both 1990 and 1999, as referenced in the NCI Petition, clearly demonstrate that a Morse proficiency test requirement is unnecessary and undesirable, in that:

- o It does not comport with the basis and purpose of the Amateur Radio Service.
- o It acts as a barrier to entry or advancement to otherwise qualified persons.
- o It is not necessarily indicative of an individual's ability to contribute to the advancement of the radio art.
- o It does not provide any indication of the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules.
- o It no longer continues to serve a regulatory purpose.
- o It otherwise does not serve the public interest and necessity.

The Commission has the authority to amend its Part 97 rules to eliminate Morse proficiency requirements by expedited order, without formal notice and public input.

- o The Commission considered the issue of continued Morse proficiency requirements in WT Docket Number 98-143 where there was extensive input from the public and concerned parties, and to this date the only change from that consideration is that the only stated reason for retaining any Morse proficiency test has been removed.

- o By granting NCI's Petition, a burden on applicants for amateur radio licenses would be removed, no additional requirement would be imposed, and therefore no party or other person would be prejudiced by such Commission action.

This course would be a wise, correct, and prudent decision on the Commission's part, because:

- o as pointed out, it is clearly within the Commission's authority;
- o it would save considerable drain on the Commission's limited and valuable resources in dealing with a matter that the Commission has already considered extensively;
- o and, it would remove an unnecessary, restrictive burden, that the Commission has already determined does not comport with the purpose of the Amateur Radio Service and serves no regulatory purpose.

The Commission should refrain from combining NCI's request for the prompt elimination of Morse test requirements from its rules with other substantially unrelated issues such as, but not limited to, band segmentation, changes in the number of license classes, sweeping changes in operator privileges by license class, etc., because that would result in unnecessary, protracted delay in resolving this important and clear-cut issue.

In summary, for all of the reasons outlined and referenced herein, the Commission should enact the following changes to its rules in the most expeditious manner possible:

- o Eliminate the "Element 1" Morse test totally from the Commission's rules for all license classes.
- o Since the only testing distinction between the Technician class and the (grandfathered) Technician Plus class is the "Element 1" Morse Test, modify, as a consequential and logical change, the privileges afforded to Technician class licensees to be equivalent to those currently afforded to Technician Plus licensees and "Technician with Morse credit" licensees.

Respectfully submitted,  
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